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May 13, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)
Wayfarer Studios LLC v. Lively, et al., No. 1:25-cv-449 (LJL)

Dear Judge Liman:

Pursuant to Rules I.C and 4.C of the Court's Individual Rules and Practices, Blake Lively and Ryan Reynolds (the "Lively-Reynolds Parties") respectfully submit this letter to advise the Court of a dispute concerning the certain of the Wayfarer Parties'¹ third-party subpoena to Venable LLP ("Venable") in the above-captioned cases (the "Actions").

On April 28, 2025, counsel for the Wayfarer Parties served a notice of intent to subpoena Venable—a law firm that does not represent any party to the Actions and, as of the date of service, did not represent any third party served with discovery in either of the Actions. The Subpoena seeks (i) all communications between Venable and the Lively-Reynolds Parties concerning the Actions; (ii) all documents concerning such communications; and (iii) all communications between specific attorneys concerning Ms. Lively.

On May 12, 2025, Venable filed a motion to quash the Subpoena in the District of Columbia. *See Venable LLP v. Wayfarer Studios LLC*, No. 25-mc-60 (RJL) (D.D.C.). In the interest of judicial economy and efficiency, the Lively-Reynolds Parties joined Venable's motion in full² and filed a motion to intervene for the limited purpose of moving to quash the Subpoena. The Subpoena seeks the Lively-Reynolds Parties' attorney communications, including those of Michael Gottlieb, with no explanation as to how they could be relevant to any parties' claims or defenses in the Actions. In light of this, the Lively-Reynolds Parties have requested that the Subpoena be quashed.

¹ The subpoena was served by Consolidated Plaintiffs Wayfarer Studios LLC, Justin Baldoni, Jamey Health, Steve Sarowitz, It Ends With Us LLC, Melissa Nathan, The Agency Group PR, LLC, and Jennifer Abel. An earlier version of this letter inadvertently and erroneously stated that Defendants Jed Wallace and Street Relations, Inc. were also proponents of the subpoena. *See* ECF No. 213, at 1 & n.1.

² On May 2, 2025, the Lively Parties requested that the Wayfarer Parties explain the relevance of the subpoenaed material. The Wayfarer Parties have yet to meaningfully respond, and the Lively Parties understand their failure to do so to confirm that the Lively Parties' attempts to confer have reached an impasse.

Respectfully submitted,

/s/ Meryl C. Goverski

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